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February 6, 2025

Honorable Steven L. Tiscione
United States District Court,
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: *AutoExpo Ent. Inc., et al. v. Elyahou, et al.*,
Case No.: 23-cv-9249

Dear Magistrate Tiscione:

Hope this correspondence finds you well. As you are aware this firm represents, Omid Elyahou, and Simpsocial LLC, Milman Labuda Law Group PLLC, represents AutoExpo Ent. Inc. (“AutoExpo”) and the other plaintiffs (collectively, “Plaintiffs”) and Defendants Avi Eitan, Fifty Seven Consulting Corp. d/b/a Certified Auto Group a/k/a Certified Performance Motors and Fazeeda Kassim (collectively the “Certified Defendants”) in the above-action.

Defendant Omid Elyahou, and Simpsocial LLC writes to respectfully request a one-week extension¹ for its time to submit its Reply to Plaintiffs’ Opposition to our motion to dismiss the Employment Retirement Income Security Act (“ERISA”), 29 U.S.C. § 1001 *et seq.* claims from February 10, 2024 to February 18, 2025, or such other date as the Court orders.

Prior to making this request, I reached out and conferred with respective counsels of record. Respective counsels were all gracious enough to Consent to a one-week extension. This is my first request for an extension of time before Your Honor. Good cause exists for the requested adjournment due to the sensitive nature of multiple criminal proceeding in addition to family health issues.

The Court’s time and attention to this matter are greatly appreciated. I apologize for any, and all inconveniences caused by this request.

Respectfully submitted,
Matin Emouna
MATIN EMOUNA

TO: ALL COUNSEL OF RECORD
VIA ECF

¹ Monday, February 17, 2025, is Presidents' Day (a federal banking holiday). Accordingly, the first business day thereafter is Tuesday February 18, 2025.